

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

SCOTT GOODWIN-BEY,)

Defendant.)

Case No. 14-02092DPR-01

MOTION FOR DETENTION

Comes now the United States of America, by and through Tammy Dickinson,
United States Attorney for the Western District of Missouri, and the undersigned
Assistant United States Attorney, and hereby moves this Court to order the detention of
the defendant, SCOTT GOODWIN-BEY, and states the following in support of the
motion:

1. A complaint has been filed charging the defendant with being a felon in
possession of a firearm, in violation of Title 18, United States Code, Section
922(g)(1).
2. Title 18, United States Code, Section 3142(f) provides, in pertinent part, that
hearing must be held by the appropriate judicial officer to determine whether
any condition or combination of conditions “will reasonably assure the
appearance of such person as required and the safety of any other person and
the community” if the attorney for the Government moves for such a hearing
and the case involves:

“(E) any felony that is not otherwise a crime of violence that involves... the possession or use of a firearm... .”

3. On November 30, 2014, the Springfield Police Department was dispatched to a Star Mart convenience store in regard to an individual, later identified as SCOTT GOODWIN-BEY, who had displayed a firearm to one of the employees.
4. The employee reported that GOODWIN-BEY had been acting erratically and pulled out a firearm while speaking with the employee. The employee took possession of the firearm and called the police.
5. The officers took custody of the firearm and determined it had been reported stolen.
6. The officers located GOODWIN-BEY a short time later and placed him under arrest for possession of a stolen firearm and being a felon in possession of a firearm.
7. GOODWIN-BEY has been convicted of felony firearms offenses on at least three occasions. Most recently, GOODWIN-BEY was convicted of being a felon in possession of a firearm and sentenced to 70 months' imprisonment on October 24, 2008, followed by three years supervised release. Said term of supervised release commenced on April 13, 2013. The Court terminated GOODWIN-BEY's term of supervised release on April 14, 2014, after the Court granted GOODWIN-BEY's motion for early termination of supervised release.

8. The evidence against the defendant is overwhelming. See 18 U.S.C. § 3142(g)(2).

Wherefore, based upon the foregoing, the United States submits that there is clear and convincing evidence that there are no conditions which the Court could place upon the defendant that would reasonably assure the defendant's appearance in Court and the safety of the community. The Government therefore requests that a detention hearing be held and that the defendant be detained pending trial of this matter.

Respectfully submitted,

Tammy Dickinson
United States Attorney

By: /s/ James J. Kelleher
James J. Kelleher
Assistant United States Attorney
Missouri Bar No. 51921

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on December 3, 2014, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ James J. Kelleher

James J. Kelleher
Assistant United States Attorney